

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Oxford Health Insurance Inc., Oxford Health Plans(NY) et al

(In the space above enter the full name(s) of the plaintiff(s)/petitioner(s).)

13 Civ. 375 (AKH) ( )

- against -

## NOTICE OF MOTION

Estate of Anne M. Christopher

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
C#  
DATE FILED: 3/8/13

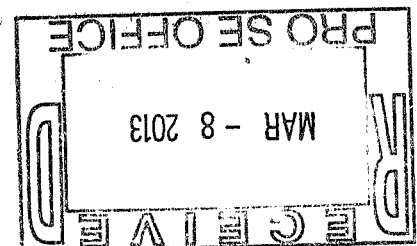
(In the space above enter the full name(s) of the defendant(s)/respondent(s).)

**PLEASE TAKE NOTICE** that upon the annexed affirmation of Allan Christopher,  
(name)  
affirmed on March 5, 2013, and upon the exhibits attached thereto (delete if no  
(date)  
exhibits); the accompanying Memorandum of Law in support of this motion (delete if there is no  
Memorandum of Law), and the pleadings herein, plaintiff/defendant will move this Court, before  
(circle one)  
Judge Hellerstein, United States District/Magistrate Judge, for an order  
(Judge's name) (circle one)  
pursuant to Rule \_\_\_\_\_ of the Federal Rules of Civil Procedure granting (state what you want the  
Judge to order): Extension of Time of 45 days starting with March 5, 2013 as the first day and with April 18, 2013 as  
the last day to Answer Complaint. Agreement made with Plaintiff's lawyer per attached email. Extension needed  
to address material and substantive issues and obtain legal counsel. Summons was received on  
February 27, 2013 from Westport, CT District Probate Court. Please see attached email with arrow highlight →

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Bedford, NH  
(city) (state)  
March 5, 2013  
(month) (day) (year)

Signature Allan C. Christopher  
Address 9 Willowbrook Court  
Bedford NH, 03110  
Telephone Number 603-472-5271  
Fax Number (if you have one) \_\_\_\_\_



XFINITY Connect

allanchristopher@comcast.net

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**FW: Request that You Please Call Me Immediately Regarding  
Summons & Complaint for Estate of Anne M. Christopher**

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**From :** John Seybert <John.Seybert@sedgwicklaw.com> Tue, Mar 05, 2013 05:11 PM  
**Subject :** FW: Request that You Please Call Me Immediately Regarding Summons & Complaint for  
Estate of Anne M. Christopher 📎 3 attachments  
**To :** allanchristopher@comcast.net  
**Cc :** Michael Bernstein <Michael.Bernstein@sedgwicklaw.com>

Mr. Christopher,

I am responding to your email since I am the one who spoke with you. Your email seems to be asking about legal guidance on how to defend this action. As I explained to you during our call on February 27, 2013, our firm represents the plaintiffs, and I cannot provide you with legal guidance.

I want to clarify a few points in your email. I spoke to you twice on February 27, 2013. In the first call, I told you I would speak with Michael Bernstein and call you back, which I did that same night. I did not represent that plaintiffs would be interested in dismissing the complaint against the Estate of Anne M. Christopher. Plaintiffs have named the Estate as a defendant in the action and we served the Estate with the Summons and Complaint. Accordingly, we have no intention of dismissing the action against the Estate. I did not understand our discussion to have any remaining issues after my second call with you.

→ As I understand your first request in your email of today, you are requesting an extension of time to answer the complaint. You may advise the Court that we consent to a 45-day extension of time. With regard to your second request, for the reasons stated above, we cannot provide you with legal research and advice about the basis for plaintiffs' claims against the Estate. Also, in response to your third request, attached is a copy of the Complaint and Summons.

I trust that this addresses the issues you raised in your email. To avoid any further confusion about what was discussed, please email me any requests or issues you want to raise.

Very truly yours,  
John

**John T. Seybert**  
John.Seybert@sedgwicklaw.com | +1-212-898-4028



225 Liberty Street, 28th Floor  
New York, NY 10281-1008  
+1-212-422-0202 phone | +1-212-422-0925 fax | www.sedgwicklaw.com

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**From:** allanchristopher@comcast.net [mailto:allanchristopher@comcast.net]  
**Sent:** Tuesday, March 05, 2013 11:35 AM  
**To:** Bernstein, Michael  
**Cc:** DAVID CHRISTOPHER; Thelma Christopher  
**Subject:** Request that You Please Call Me Immediately Regarding Summons & Complaint for Estate of Anne M. Christopher

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Oxford Health Insurance Inc., Oxford Health Plans(NY) et al

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13 Civ. 375 (AKH) ( )

- against -

**AFFIRMATION IN  
SUPPORT OF MOTION**

Estate of Anne M. Christopher

(In the space above enter the full name(s) of the defendant(s)/respondent(s).)

I, Allan Christopher, affirm under penalty of perjury that:

1. I, <sup>(name)</sup> Estate of Anne M. Christopher, am the plaintiff/defendant in the above entitled action, and respectfully move this Court to issue an order <sup>(circle one)</sup> To extend time to answer complaint to 45 days.  
(state what you want the Judge to order)

2. The reason why I am entitled to the relief I seek is the following (state all your reasons using additional paragraphs and sheets of paper as necessary): Received Summons & Complaint in regular mail on February 27, 2013. Need to find a Probate lawyer to represent me who has admission to SDNY Fed. Court, CT Court. Need to research complex substantive and material aspects of complaint & legal basis of complaint before providing Answer. Do not have a law background which makes it challenging and time consuming.

**WHEREFORE**, I respectfully request that the Court grant this motion, as well as such other and further relief as may be just and proper.

**I declare under penalty of perjury that the foregoing is true and correct.**

Dated: Bedford, NH  
(city) (state)  
March 5, 2013  
(month) (day) (year)

Signature Allan C. Christopher  
Address 9 Willowbrook Court  
Bedford NH 03110  
Telephone Number 603-472-5271  
Fax Number (if you have one) \_\_\_\_\_

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Oxford Health Insurance Inc., Oxford Health Plans (NY) et al

(List the name(s) of the plaintiff(s)/petitioner(s).)

13 Civ. 375 (AKH) ( )

- against -

AFFIRMATION OF SERVICE

Estate of Anne M. Christopher

(List the name(s) of the defendant(s)/respondent(s).)

I, (print your name) Allan Christopher, declare under penalty of perjury that I served a copy of the attached (list the names of the documents you served): 1) Motion of Motion for time extension to Answer) with one page attachment 2) Affirmation in Support of Motion (for time extension)

upon all other parties in this case by (state how you served the documents, for example, hand delivery, mail, overnight express) standard USPS mail to the

following persons (list the names and addresses of the people you served):

- Sedgwick LLP  
1) Michael Bernstein, Esq, 225 Liberty Street 28th Floor New York, New York 10281-1008  
2) John Seybert Esq, Sedgwick LLP, 225 Liberty Street, 28th Floor, New York, New York 10281-1008

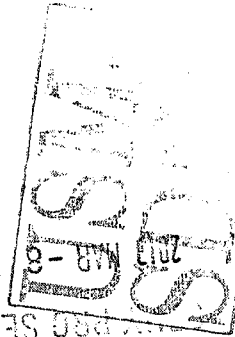
on (date you served the document(s)) Mailed from Bedford NH, March 6, 2013

March 6, 2013  
Dated

Allan L. Christopher  
Signature  
9 Willowbrook Court  
Address  
Bedford NH, 0  
City, State  
03110  
Zip  
603-472-5271  
Telephone Number  
allan.christopher@comcast.net  
E-Mail Address

Allen Christopher  
Sullivan Court  
Bedford NH 03110

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PRO SE OFFICE  
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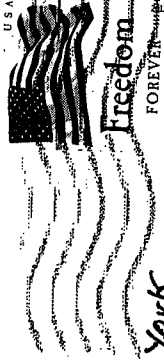
United States District Court of Southern District of New York

Pro Se Office

Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 200  
New York, New York 10007

MANCHESTER NH 0380

05 MAR 2013 PM 12



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